

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 18-CR-37-JED-3
)	
CHRISTINA ANN DEMPSEY,)	
)	
Defendant.)	

**UNITED STATE'S MOTION FOR ONE LEVEL REDUCTION
FOR ACCEPTANCE OF RESPONSIBILITY**

The United States of America, through Timothy L. Faerber, Assistant United States Attorney, hereby moves that the defendant's total offense level be decreased by one additional level for early acceptance of responsibility under United States Sentencing Guidelines § 3E1.1(b).¹ In support of its motion, the United States represents that the defendant has assisted authorities in the investigation and prosecution of her own misconduct by timely notifying authorities of her intention to enter a plea of guilty, thereby permitting the United States to avoid preparing for trial and permitting the United States and the Court to allocate their resources efficiently.

¹ The United States files this motion to assist the United States Probation Office in its sentencing guidelines calculation for purposes of the Presentence Investigation Report, and to comply with the terms of the plea agreement. Nevertheless, as provided in the plea agreement, the stipulated sentence is neither based upon nor tied to the sentencing guidelines calculation.

Accordingly, the United States would request that the Court decrease defendant's offense level by one additional level, as provided for in United States Sentencing Guideline § 3E1.1(b).

Respectfully submitted,

R. TRENT SHORES
UNITED STATES ATTORNEY

TIMOTHY L. FAERBER, OBA No. 14711
Assistant United States Attorney
110 West Seventh Street, Suite 300
Tulsa, Oklahoma 74119
(918) 382-2700

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of August, 2018, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Scott A. Troy
Defense Counsel
scott.troy@morelaw.com

Timothy L. Faerber
Assistant United States Attorney